

1 Honorable John C. Coughenour
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8 UNITED STATES DISTRICT COURT
9 WESTERN DISTRICT OF WASHINGTON
10 SEATTLE, WASHINGTON

11 JUAN ALBERTO
12 CASTANEDA MIRANDA,

13 Plaintiff,

14 vs.

15 U.S. DRUG
16 ENFORCEMENT
17 ADMINISTRATION, a U.S.
18 government agency; U.S.
19 FEDERAL BUREAU OF
20 INVESTIGATION, a U.S.
21 government agency; and U.S.
22 BUREAU OF ALCOHOL,
23 TOBACCO, FIREARMS &
24 EXPLOSIVES, a U.S.
government agency; AGENT
AGUIRE, BADGE NO. 7785,
an employee for the U.S.
federal government; AGENT
MORELAND, BADGE NO.
7701, an employee for the

FILE NO. 2:21-cv-00952-JCC

**PLAINTIFF'S RESPONSE
TO ORDER TO SHOW
CAUSE, AND**

**PLAINTIFF'S REQUEST
FOR A VALENTIN ORDER**

25 PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE, AND
PLAINTIFF'S REQUEST FOR A VALENTIN ORDER - 1

1 U.S. federal government; and
2 UNKNOWN NAMED
3 AGENTS OF THE U.S.
4 FEDERAL BUREAU OF
5 INVESTIGATION, U.S.
6 DRUG ENFORCEMENT
7 ADMINISTRATION, U.S.
8 BUREAU OF ALCOHOL,
9 TOBACCO, FIREARMS &
10 EXPLOSIVES 1-10,
11 inclusive,

12 Defendants.

13

14 **PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE**

15 **AND**

16 **PLAINTIFF'S REQUEST FOR A *VALENTIN* ORDER**

17 Patrick Patton, WSBA No. 49159
18 Salish Sea Law Group PLLC
19 1495 158th Place NE
20 Bellevue, WA 98008
21 (206) 330-0312 – Voice
22 (206) 770-6238 – Facsimile
23 patrick@salishsealawgroup.com

24 Attorney for Plaintiff

25 **PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE, AND
PLAINTIFF'S REQUEST FOR A *VALENTIN* ORDER - 2**

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1495 158th Place NE
Bellevue, WA 98008
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206.770.6238 (fax)
patrick@salishsealawgroup.com

1 Plaintiff, Juan Castaneda Miranda, respectfully responds to the Court's
 2 Minute Order, dated December 7, 2021, ordering Plaintiff to show cause why
 3 this case should not be dismissed against the remaining Defendants for failure
 4 to prosecute.
 5

6 I. BACKGROUND

7 Agencies have been unwilling to provide documents, records and
 8 names of agents who were involved in this raid of Plaintiff, his then-girlfriend,
 9 home and vehicle.
 10

11 Plaintiff sent a FOIA request to Defendant Federal Bureau of
 12 Investigations (FBI); this FOIA request was denied by the FBI on September
 13 17, 2021. *See Exhibit 1, Letter from Defendant FBI, Denying Request, dated*
 14 *September 17, 2021.*
 15

16 On November 27, 2021, Plaintiff submitted a FOIA request online to
 17 Defendant U.S. Bureau of Alcohol, Tobacco, Firearms & Explosives (ATF).
 18 As of December 16, 2021, the ATF has not responded to this FOIA request.
 19 *See Exhibit 2, SecureRelease Portal FOIA Request, dated November 27,*
 20 *2021.*
 21

22 On November 30, 2021, Plaintiff sent a FOIA request to Defendant
 23 Drug Enforcement Agency (DEA), requesting all records regarding this
 24
 25

PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE, AND
 PLAINTIFF'S REQUEST FOR A VALENTIN ORDER - 3

1 incident, in a further effort to identify the specific DEA agents who were
2 assigned and involved in this incident. The DEA has only responded stating
3 they received this FOIA request. *See Exhibit 3, FOIA request to Defendant*
4 *DEA, dated November 30, 2021, and receipt confirmation via e-mail dated*
5 *December 16, 2021.*

6
7 On November 30, 2021, Plaintiff sent a second FOIA request to
8 Defendant FBI. As of December 16, 2021, the FBI has not responded to this
9 record request. *See Exhibit 4, FOIA request to Defendant FBI, dated*
10 *November 30, 2021.*

11
12 Based upon these pending FOIA requests and Plaintiff's continued
13 efforts to determine the specific agents involved in this raid, Plaintiff
14 respectfully requests the Court not dismiss this case, and issue a *Valentin* order
15 requiring that all agents involved in orchestrating, and executing the raid, be
16 identified so that they can be properly served and named in this lawsuit.
17 Alternatively, Plaintiff requests an additional three months, or however long
18 the court sees fit, to exhaust efforts to complete discovery to determine the
19 Defendant agents in this matter.

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25 PLAINIFF'S RESPONSE TO ORDER TO SHOW CAUSE, AND
PLAINTIFF'S REQUEST FOR A VALENTIN ORDER - 4

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2 II. LEGAL ARGUMENT

3 Plaintiff looks to the matter of *Valentin v. Dinkins, et al.*, 121 F.3d 72
 4 (1997), in his request to the court that an order be granted to identify agents
 5 involved in the raid that occurred at the Defendant's apartment on July 13th,
 6 2018.

7 It is a general principle of tort law that a tort victim who cannot identify
 8 the tortfeasor can still bring suit. *See Billman v. Indiana Dep't of Corrections*,
 9 56 F.3d 785, 789 (7th Cir. 1995). In *Billman*, the 7th Circuit reversed the sua
 10 sponte dismissal of a complaint because Plaintiff had not referred to the
 11 Defendant corrections officer by name. The Court stated that plaintiff's
 12 "initial inability to identify the injurers is not by itself a proper ground for the
 13 dismissal of the suit," as this would "gratuitously prevent [plaintiff] from
 14 using the tools of pretrial discovery to discover the defendants' identity." *Id.*
 15 *See also Maclin v. Paulson*, 627 F.2d 83, 87 (7th Cir. 1980) (when "a party is
 16 ignorant of defendants' true identity, it is unnecessary to name them until their
 17 identity can be learned through discovery or through the aid of the trial
 18 court"). The Eighth and Ninth Circuits have adopted similar stances. *See*
 19 *Munz v. Parr*, 758 F.2d 1254, 1257 (8th Cir. 1985) ("Rather than dismissing
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 25 PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE, AND
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1 the claim, the court should have ordered disclosure of Officer Doe's identity
 2 by other defendants named and served or permitted the plaintiff to identify the
 3 unknown defendants, unless it is clear that discovery would not uncover the
 4 identities, or that the complaint would be dismissed on other grounds").
 5

6 *Valentin's* case provides a paradigmatic example of why an order is
 7 necessary so a Defendant may be fully identified. 121 F.3d 72 (1997).
 8 Plaintiff in the case at hand, has made concerted efforts to try and identify the
 9 Defendant agents, but Defendant agencies have consistently refused, blocked,
 10 and prevented Plaintiff, Juan Castaneda Miranda, from receiving the
 11 discovery, in order to identify the Agents, that participated in the raid at the
 12 Plaintiffs place of residence on July 13th, 2018.
 13

14 Because Defendants have been uncooperative in providing the names
 15 of the agents that participated in the raid, FOIA requests have not been
 16 successful and there has been no indication that they will succeed, Plaintiff
 17 has been prejudiced in bringing his claim and showing this court the merits of
 18 his claim in litigation. Plaintiff respectfully requests that the court issue a
 19 *Valentin's* order so that he can ascertain the names of the agents involved and
 20 attempt to properly serve them.
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 25 PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE, AND
 PLAINTIFF'S REQUEST FOR A *VALENTIN* ORDER - 6

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1 Alternatively, Plaintiff respectfully requests that the court allow him an
 2 extension of three months to determine whether the specific agents' names
 3 can be ascertained via the FOIA requests. If names are ascertained within 3
 4 months, Plaintiff's requests leave of the court to amend the Complaint to name
 5 these agents, and properly serve them in this matter. If names are not
 6 ascertained within 3 months, Plaintiff asks the court to subsequently issue a
 7 *Valentin* order, or whatever order the court deems fit, in order to ascertain the
 8 names of the unknown named agents, and allow time to serve the agents, and
 9 proceed with case.

12 **III. CONCLUSION & RELIEF REQUESTED**

13 WHEREFORE, Plaintiff, Juan Castaneda Miranda, respectfully
 14 requests the Court to enter an Order:

16 1. Requiring Defendant agencies to identify, disclose and provide
 17 the names and contact information for all agents involved in, and at the scene
 18 of this incident of July 17, 2018; these disclosures to be completed and
 19 provided to the Plaintiff no later than 60 days after the order is issued.

21 2. Alternatively, Plaintiff respectfully requests that the court allow
 22 him an extension of three months to determine whether the involved agents'
 23 names can be ascertained via the FOIA requests.

3. If involved agent's names are not ascertained after three months,

Plaintiff asks the court to subsequently issue a *Valentin* order, or an order the court deems fit, in order to ascertain the names of the unknown named agents, and allow time to serve the agents, and proceed with case.

RESPECTFULLY SUBMITTED this 16th day of December 2021.

/s/ *Patrick Patton*

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Attorney for Plaintiff

**PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE, AND
PLAINTIFF'S REQUEST FOR A *VALENTIN* ORDER - 8**

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10 JUAN ALBERTO
11 CASTANEDA MIRANDA,

12 Plaintiff,

13 vs.

14 U.S. DRUG
15 ENFORCEMENT
16 ADMINISTRATION, a U.S.
17 government agency; U.S.
18 FEDERAL BUREAU OF
19 INVESTIGATION, a U.S.
20 government agency; and
21 U.S. BUREAU OF
22 ALCOHOL, TOBACCO,
23 FIREARMS &
24 EXPLOSIVES, a U.S.
government agency;
AGENT AGUIRE, BADGE
NO. 7785, an employee for
the U.S. federal government;
AGENT MORELAND,
BADGE NO. 7701, an

FILE NO. 2:21-cv-00952-JCC

**DECLARATION OF PATRICK
PATTON REGARDING
SUBMISSION OF FOIA
REQUESTS**

25
PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE, AND
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1 employee for the U.S.
2 federal government; and
3 UNKNOWN NAMED
4 AGENTS OF THE U.S.
5 FEDERAL BUREAU OF
6 INVESTIGATION, U.S.
7 DRUG ENFORCEMENT
8 ADMINISTRATION, U.S.
9 BUREAU OF ALCOHOL,
10 TOBACCO, FIREARMS &
11 EXPLOSIVES 1-10,
12 inclusive,

13 Defendants.

14 I, Patrick Patton, declare the following under the penalty of perjury:

15 I am over the age of 18 years and otherwise qualified to testify:

- 16 1. I am the attorney for the Plaintiff in this matter, and I make this
17 Declaration based upon my own knowledge.
- 18 2. Attached hereto as **Exhibit 1** is a true and correct copy of the
19 denial letter, dated September 17, 2021, of the FOIA request
20 submitted to the FBI.
- 21 3. Attached hereto as **Exhibit 2** is a true and correct copy of the
22 FOIA request submitted to the ATF on November 27, 2021.
- 23 4. Attached hereto as **Exhibit 3** is a true and correct copy of the
24 FOIA request and the certification of identity submitted to the
25 DEA November 30, 2021.
- 26 5. Attached hereto as **Exhibit 4** is a true and correct copy of the
27 FOIA request and the certification of identity submitted to the
28 FBI November 30, 2021.

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30 PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE, AND
31 PLAINTIFF'S REQUEST FOR A *VALENTIN* ORDER - 10

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1
2 **I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS**
3 **OF THE STATE OF WASHINGTON THAT THE FOREGOING IS**
4 **TRUE AND CORRECT.**

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6

7 Dated this 16th day of December 2021.
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PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE, AND
PLAINTIFF'S REQUEST FOR A *VALENTIN* ORDER - 11

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1
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EXHIBIT 1
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4
5 U.S. Department of Justice
6



7
8
9 Federal Bureau of Investigation
10 Washington, D.C. 20535
11

12 September 17, 2021
13

14 MS. CHRISTINE PHILLIPS
15 SALISH SEA LAW GROUP LLC
16 1495 158TH PLACE NORTH EAST
17 BELLEVUE, WA 98008
18

19 Request No.: 1505037-000
20 Subject: Raid on Mr. Juan Miranda's
21 Apartment
22 (July 2018)
23

24 Dear Ms. Phillips:

25 This acknowledges receipt of your Freedom of Information/Privacy Acts (FOIPA) request to the FBI on behalf of your client. The FOIPA Request Number listed above has been assigned to your request. Below you will find information relevant to your request. Please read each item carefully.

You have requested records on one or more third party individuals. Please be advised the FBI will neither confirm nor deny the existence of such records pursuant to FOIA exemptions (b)(6) and (b)(7)(C), 5 U.S.C. §§ 552 (b)(6) and (b)(7)(C). The mere acknowledgement of the existence of FBI records on third party individuals could reasonably be expected to constitute an unwarranted invasion of personal privacy. This is our standard response to such requests and should not be taken to mean that records do, or do not, exist. As a result, your request has been closed. To reopen your request, please complete and return the attached Certification of Identity form. Your name must be listed in the "Authorization to Release Information to Another Person" field.

If you submitted your request through the FBI's eFOIPA portal and you are receiving correspondence through standard mail, it was determined your request did not meet the eFOIPA terms of service.

For questions regarding our determinations, visit the www.fbi.gov/foia website under "Contact Us." The FOIPA Request number listed above has been assigned to your request. Please use this number in all correspondence concerning your request.

If you are not satisfied with the Federal Bureau of Investigation's determination in response to this request, you may administratively appeal by writing to the Director, Office of Information Policy (OIP), United States Department of Justice, 441 G Street, NW, 6th Floor, Washington, D.C. 20530, or you may submit an appeal through OIP's FOIA STAR portal by creating an account following the instructions on OIP's website: <https://www.justice.gov/oip/submit-and-track-request-or-appeal>. Your appeal must be postmarked or electronically transmitted within ninety (90) days of the date of my response to your request. If you submit your appeal by mail, both the letter and the envelope should be clearly marked "Freedom of Information Act Appeal." Please cite the FOIPA Request Number assigned to your request so it may be easily identified.

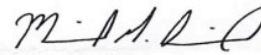
PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE, AND
PLAINTIFF'S REQUEST FOR A VALENTIN ORDER - 12

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You may seek dispute resolution services by contacting the Office of Government Information Services (OGIS). The contact information for OGIS is as follows: Office of Government Information Services, National Archives and Records Administration, 8601 Adelphi Road-OGIS, College Park, Maryland 20740-6001, e-mail at ogis@nara.gov; telephone at 202-741-5770; toll free at 1-877-684-6448; or facsimile at 202-741-5769. Alternatively, you may contact the FBI's FOIA Public Liaison by emailing foipaquestions@fbi.gov. If you submit your dispute resolution correspondence by email, the subject heading should clearly state "Dispute Resolution Services." Please also cite the FOIPA Request Number assigned to your request so it may be easily identified.

Enclosed for your information is a copy of the Explanation of Exemptions.

Sincerely,



Michael G. Seidel
Section Chief
Record/Information
Dissemination Section
Information Management Division

Enclosure(s)

**PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE, AND
PLAINTIFF'S REQUEST FOR A VALENTIN ORDER - 13**

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EXHIBIT 2

1 SecureRelease™ Portal 11/27/21, 14:11 PM

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4 **SecureRelease™ Portal** Christine Phillips
christine@salishsealawgroup.com

5

6 **Details of Request** Request Number: Pending

7 (Read only details of request) CANCEL

8

9

10 **Request Description:** Our office represents Mr. Juan Castaneda Fee Waiver Requested?: Not Requested

11 Miranda, whom ATF, FBI and DEA raided Mr.

12 Castaneda Miranda's apartment in Lynnwood,

13 Washington on July 17, 2018. Please provide our

14 office with a complete, legible, unredacted copy

15 of the ATF's records regarding this raid, including,

16 but not limited to warrant(s), reports,

17 photographs, audio and visual recordings,

18 correspondence, etc. related to ATF's

19 involvement of this raid on Mr. Castaneda

20 Miranda and his home on July 17, 2018 at the

21 Viking Apartments at 6630 202nd Street,

22 Lynnwood, Washington.

23 **Reason for Fee Waiver:** -

24 **Expedited Processing?:** Not Requested

25

26 **Agency:** Department of Justice

27

28 **Component:** Bureau of Alcohol, Tobacco, Firearms, and Reason for Expedited Processing: -

29 Explosives

30

31 **Processing Track:** TBD

32 **Request Type:** FOIA

33 **Submitted Date:** 11/27/2021

34 **Request Status:** Submitted - Pending Review

35

36 **Files uploaded by user** Search

37

File Name	Attachment Type
No attachments to display	

38 5 rows ▾ |< < 0-0 of 0 >|

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PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE, AND
PLAINTIFF'S REQUEST FOR A VALENTIN ORDER - 14

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EXHIBIT 3

SALISH SEA LAW GROUP, PLLC
PATRICK PATTON, ATTORNEY AT LAW

30 November 2021

DEA FOIA/Records Management Section
Attn: FOIA/PA Unit (FSRF)
8701 Morrisette Drive
Springfield, Virginia 22152

Re: Client : Juan Castaneda Miranda
Date of Incident : July 17, 2018
Location : Viking Apartments
6630 202nd Street
Lynnwood, WA 98036

Dear FOIA Officer:

This is a request under the Freedom of Information Act.

Attached please find a completed and signed *Certification of Identity* (DOJ Form 361).

Our office represents Mr. Juan Castaneda Miranda, whom ATF, FBI and DEA raided Mr. Castaneda Miranda's apartment on July 17, 2018, only to learn that they had the incorrect apartment and person. The individual the agents were allegedly looking for was Jose Verduzco Urias, who was subsequently arrested on this date in the parking lot of the Viking Apartments.

Please provide our office with a complete, legible, unredacted copy of the ATF's records regarding this raid, including, but not limited to warrant(s), reports, photographs, audio and visual recordings, correspondence, etc. related to ATF's involvement of this raid on Mr. Castaneda Miranda and his home on July 17, 2018 at the Viking Apartments at 6630 202nd Street, Lynnwood, Washington.

If you have any questions or need additional information regarding this request, please feel free to contact me at (206) 979-3514 or by e-mail at christine@salishsealawgroup.com.

Thank you for your assistance.

Sincerely,



Christine Phillips

cc: Mr. Juan Castaneda Miranda

Enclosure: As Stated Above



T: 206-972-LAWS (5297)

F: 206-770-6238

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1495 158th Avenue NE
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www.SalishSeaLawGroup.com

PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE, AND
PLAINTIFF'S REQUEST FOR A VALENTIN ORDER - 15

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From: Patrick Patton patrick@salishsealawgroup.com
Subject: Fwd: DEA FOIA/PA Case Number: 22-00114-P
Date: 16 December 2021 at 08:17 AM
To: Christine Phillips christine@salishsealawgroup.com

PP

----- Forwarded message -----

From: Lidia.Eyob@dea.gov
Date: Thu, Dec 16, 2021, 07:49
Subject: DEA FOIA/PA Case Number: 22-00114-P
To: <Patrick@salishsealawgroup.com>

Dear Ms. Phillips:

This is to acknowledge receipt of your Freedom of Information Act/Privacy Act (FOIA/PA) request by the Drug Enforcement Administration, FOIA/PA Section. This response is a courtesy reply. It does not replace the acknowledgement letter that will be sent to you once your request has been reviewed by our Intake Unit. Please note, requests are handled in the order they are received. We will advise you if any additional information is required.

Please be advised, due to necessary operational changes as a result of the national emergency concerning the novel coronavirus disease (COVID-19) outbreak, there may be some delay in the processing of your request.

You may wish to visit DEA's public facing website at www.dea.gov or the FOIA Library available at [FOIA Library](#) | [DEA.gov](#) to determine if the information you seek is already available to the public.

You may contact our FOIA Public Liaison at (571) 776-3139 for any further assistance and to discuss any aspect of your request. Additionally, you may contact the Office of Government Information Services (OGIS) at the National Archives and Records Administration to inquire about the FOIA mediation services they offer. The contact information for OGIS is as follows: Office of Government Information Services, National Archives and Records Administration, Room 2510, 8601 Adelphi Road, College Park, Maryland 20740-6001; e-mail at ogis@nara.gov; telephone at (202) 741-5770; toll free at 1-877-684-6448; or facsimile at (202) 741-5769.

If you have any questions regarding this email, you may contact our FOIA Requester Service Center at (571) 776-2300. Thank you for your patience as we work to complete the processing of your request.

Sincerely,

Lidia Eyob
FOIA/PA Specialist
Intake Sub-Unit
FOIA/PA Unit
Drug Enforcement Administration
E-mail: Lidia.Eyob@dea.gov

PRIVACY ACT NOTICE: This e-mail (including any attachments herein) may contain personal and privileged information that requires protection in compliance with the Privacy Act of 1974 (5 U.S.C. § 552a). Any use of this information by anyone other than the intended recipient is prohibited. If you have received this communication in error, please immediately delete all copies of this information and notify me by e-mail. The use, dissemination, distribution, or reproduction of this communication by unintended recipients is not authorized and may be unlawful.

PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE, AND PLAINTIFF'S REQUEST FOR A VALENTIN ORDER - 17

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EXHIBIT 4

SALISH SEA LAW GROUP, PLLC
PATRICK PATTON, ATTORNEY AT LAW

30 November 2021

Michael G. Seidel, Section Chief
Record/Information Dissemination Section
Information Management Division
U.S. Department of Justice
Federal Bureau of Investigation
170 Marcel Drive
Winchester, VA 22602-4843

Re: Client : Juan Castaneda Miranda
Date of Incident : July 17, 2018
Location : Viking Apartments
6630 202nd Street
Lynnwood, WA 98036
Request No. : 1505037-000

Dear FOIA Officer:

This is a request under the Freedom of Information Act.

Attached please find a completed and signed *Certification of Identity* (DOJ Form 361).

Our office represents Mr. Juan Castaneda Miranda, whom ATF, FBI and DEA raided Mr. Castaneda Miranda's apartment on July 17, 2018, only to learn that they had the incorrect apartment and person. The individual the agents were allegedly looking for was Jose Verduzco Urias, who was subsequently arrested on this date in the parking lot of the Viking Apartments.

Please provide our office with a complete, legible, unredacted copy of the ATF's records regarding this raid, including, but not limited to warrant(s), reports, photographs, audio and visual recordings, correspondence, etc. related to ATF's involvement of this raid on Mr. Castaneda Miranda and his home on July 17, 2018 at the Viking Apartments at 6630 202nd Street, Lynnwood, Washington.



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PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE, AND PLAINTIFF'S REQUEST FOR A VALENTIN ORDER - 18

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1
2
3 **SALISH SEA LAW GROUP, PLLC**
4 PATRICK PATTON, ATTORNEY AT LAW

5
6 If you have any questions or need additional information regarding this request, please feel
7 free to contact me at (206) 979-3514 or by e-mail at christine@salishsealawgroup.com.

8 Thank you for your assistance.
9
10

11 Sincerely,

12 

13 Christine Phillips
14
15

16 cc: Mr. Juan Castaneda Miranda
17
18 Enclosure: As Stated Above
19
20



22 SALISH SEA LAW GROUP
23
24

25 T: 206-972-LAWS (5297)

F: 206-770-6238

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PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE, AND
PLAINTIFF'S REQUEST FOR A VALENTIN ORDER - 19

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3 U.S Department of Justice

Certification of Identity

FORM APPROVED OMB NO. 1103-0016
EXPIRES 05/31/2023

5 Privacy Act Statement. In accordance with 28 CFR Section 16.41(d) personal data sufficient to identify the individuals submitting requests by
 6 mail under the Privacy Act of 1974, 5 U.S.C. Section 552a, is required. The purpose of this solicitation is to ensure that the records of individuals
 who are the subject of U.S. Department of Justice systems of records are not wrongfully disclosed by the Department. Requests will not be
 processed if this information is not furnished. False information on this form may subject the requester to criminal penalties under 18 U.S.C.
 Section 1001 and/or 5 U.S.C. Section 552a(i)(3).

7 Public reporting burden for this collection of information is estimated to average 0.50 hours per response, including the time for reviewing
 instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of
 information. Suggestions for reducing this burden may be submitted to the Office of Information and Regulatory Affairs, Office of Management
 and Budget, Public Use Reports Project (1103-0016), Washington, DC 20503.

8 Full Name of Requester ¹ Juan Alberto Castaneda Miranda A-204-503-3789 Citizenship Status ² Approved DACA Social Security Number ³ 010-41-2261

10 Current Address 509 Kerr Avenue, Modesto, California 95354

11 Date of Birth 05/25/1992 Place of Birth Mexico

12 OPTIONAL: Authorization to Release Information to Another Person

13 This form is also to be completed by a requester who is authorizing information relating to himself or herself to be released to another person.

14 Further, pursuant to 5 U.S.C. Section 552a(b), I authorize the U.S. Department of Justice to release any and all information relating to me to:

Patrick Patton, Salish Sea Law Group, PLLC 1495 158th Place NE, Bellevue, Washington 98008

15 Print or Type Name

16 I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that I am the person
 named above, and I understand that any falsification of this statement is punishable under the provisions of 18 U.S.C. Section 1001 by a fine of
 not more than \$10,000 or by imprisonment of not more than five years or both, and that requesting or obtaining any record(s) under false
 pretenses is punishable under the provisions of 5 U.S.C. 552a(i)(3) by a fine of not more than \$5,000.17 Signature ⁴ Juan Castaneda Date 11/29/202118 ¹Name of individual who is the subject of the record(s) sought.

²Individual submitting a request under the Privacy Act of 1974 must be either "a citizen of the United States or an alien lawfully admitted for permanent residence," pursuant to 5 U.S.C. Section 552a(a)(2). Requests will be processed as Freedom of Information Act requests pursuant to 5 U.S.C. Section 552, rather than Privacy Act requests, for individuals who are not United States citizens or aliens lawfully admitted for permanent residence.

³Providing your social security number is voluntary. You are asked to provide your social security number only to facilitate the identification of records relating to you. Without your social security number, the Department may be unable to locate any or all records pertaining to you.

19 ⁴Signature of individual who is the subject of the record sought.

20 FORM DOJ-361

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25 PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE, AND
PLAINTIFF'S REQUEST FOR A VALENTIN ORDER - 20

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